

March 14, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONDOCKETED
USNRCBEFORE THE ATOMIC SAFETY AND LICENSING BOARD

84 MAR 19 10:23

In the Matter of)

CAROLINA POWER & LIGHT COMPANY)
and NORTH CAROLINA EASTERN)
MUNICIPAL POWER AGENCY)(Shearon Harris Nuclear Power)
Plant, Units 1 and 2))OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHDocket Nos. 50-400 OL
50-401 OLAPPLICANTS' SUPPLEMENTAL RESPONSES TO
WELLS EDDLEMAN'S GENERAL INTERROGATORIES
AND INTERROGATORIES ON CONTENTIONS 41 AND 65
TO APPLICANTS CAROLINA POWER & LIGHT COMPANY, et al.
(FIRST SET)

Pursuant to the Licensing Board's "Memorandum and Order (Ruling on Discovery Disputes)" of October 6, 1983, and to rulings issued by the Board during telephone conferences on September 22 and 23, 1983, and on March 8, 1984, Applicants herein provide their responses to the remaining portion of those interrogatories for which the Board granted intervenor Eddleman's Motion to Compel Discovery. Additional supplemental responses were previously filed by Applicants on November 11, 1983 and January 13, 1984.

The information provided in Exhibits A and B, which are discussed below, is confidential and is being supplied only to intervenor Eddleman. The Board ruled, during the telephone conference on March 8, 1984, that the answers to Eddleman Interrogatories 41-1(1) and 41-1(m) are to be provided to

8403200030 840314
PDR ADOCK 05000400
PDR

DS03

Mr. Eddleman subject to, and conditional upon, implementation by Mr. Eddleman of the commitments and agreements made in "Wells Eddleman's Response to Applicants' Motion for Protective Order," dated January 30, 1984. The Board ordered that those commitments and agreements to protect the information are binding upon Mr. Eddleman. Tr. 759.

RESPONSES TO GENERAL INTERROGATORIES

INTERROGATORY NO. G1(c): Please state the name, present or last known address, and present or last known employer of each person whom Applicants believe or know (1) has first-hand knowledge of the facts alleged in each such answer; or (2) upon whom Applicants relied (other than their attorneys) in making such answer.

ANSWER: W. D. Goodman, who is employed as project manager by Daniel Construction Company at the Shearon Harris Nuclear Power Plant, provided information upon which Applicants relied in answering Interrogatories 41-1(1) and 41-1(m).

RESPONSES TO INTERROGATORIES ON CONTENTION 41

INTERROGATORY NO. 41-1(1): Provide a list of the names and last-known addresses of those structural welders in Craft 66, the pipe fitter craft. (Tr. 722; Oct. 6, 1983 Memorandum and Order at 3.)

INTERROGATORY NO. 41-1(m): For each welder identified above, state the date hired and, if applicable, the date discharged, laid off or resigned. For a random sample (to be worked out between the parties), provide information on qualifications when hired, including a general description of any welding training courses and the date failed, if applicable. (Tr. 665)

ANSWER: Exhibit A hereto sets forth the name, last known address and dates of employment at the Harris Plant for each Craft 66 structural welder.

Exhibit B hereto contains the qualifications when hired of, and post-employment training received by, a random sample of those employees (agreed to previously by Mr. Eddleman and Applicants) identified in Exhibit A.

Respectfully submitted,

Thomas A. Baxter

Thomas A. Baxter, P.C.
SHAW, PITTMAN, POTTS & TROWBRIDGE
1800 M Street, N.W.
Washington, D.C. 20036
(202) 822-1090

Richard E. Jones
Samantha Francis Flynn
CAROLINA POWER & LIGHT COMPANY
P.O. Box 1551
Raleigh, North Carolina 27602
(919) 836-6517

Counsel for Applicants

Dated: March 14, 1984

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-400 OL
50-401 OL

State of North Carolina

Roland M. Parsons

My Commission expires: My Commission Expires 4-30-86

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	Docket Nos. 50-400 OL
and NORTH CAROLINA EASTERN)	50-401 OL
MUNICIPAL POWER AGENCY)	
)	
(Shearon Harris Nuclear Power)	
Plant, Units 1 and 2))	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Supplemental Responses to Wells Eddleman's General Interrogatories and Interrogatories on Contentions 41 and 65 to Applicants Carolina Power & Light Company, et al. (First Set)" were served this 14th day of March, 1984, by deposit in the U.S. mail, first class, postage prepaid, upon the parties on the attached Service List. Exhibits A and B were served only upon Mr. Eddleman.

Thomas A. Baxter

Thomas A. Baxter, P.C.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	Docket Nos. 50-400 OL
and NORTH CAROLINA EASTERN)	50-401 OL
MUNICIPAL POWER AGENCY)	
)	
(Shearon Harris Nuclear Power)	
Plant, Units 1 and 2))	

SERVICE LIST

James L. Kelley, Esquire
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Glenn O. Bright
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. James H. Carpenter
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Charles A. Barth, Esquire
Janice E. Moore, Esquire
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Daniel F. Pead, President
CHANGE/ELP
5707 Waycross Street
Raleigh, North Carolina 27606

John D. Runkle, Esquire
Conservation Council of North Carolina
307 Granville Road
Chapel Hill, North Carolina 27514

M. Travis Payne, Esquire
Edelstein and Payne
P.O. Box 12607
Raleigh, North Carolina 27605

Dr. Richard D. Wilson
729 Hunter Street
Apex, North Carolina 27502

Mr. Wells Eddleman
718-A Iredell Street
Durham, North Carolina 27705

Richard E. Jones, Esquire
Vice President and Senior Counsel
Carolina Power & Light Company
P.O. Box 1551
Raleigh, North Carolina 27602

Dr. Phyllis Lotchin
108 Bridle Run
Chapel Hill, North Carolina 27514

Dr. Linda W. Little
Governor's Waste Management Board
513 Albemarle Building
325 North Salisbury Street
Raleigh, North Carolina 27611

Bradley W. Jones, Esquire
U.S. Nuclear Regulatory Commission
Region II
101 Marietta Street
Atlanta, Georgia 30303

Ruthanne G. Miller, Esquire
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Robert P. Gruber
Executive Director
Public Staff - NCUC
P.O. Box 991
Raleigh, North Carolina 27602